

From: [Allen, Bob \(PCS\)](#)
To: [Garyg.Miller/R6/USEPA/US@EPA](#); [Blount, John \(HCPID\)](#)
Cc: [Patel, Snehal \(CAO\)](#); [Babin, Latrice \(PCS\)](#); [Vancas, Cecilia \(PCS\)](#); [Mueller, Stuart \(PCS\)](#); ['Blount, John \(HCPID\)'](#)
Subject: SJWRP - PCS Comments on the draft EAM 3/9/12
Date: 03/09/2012 08:46 AM

Gary,

Please see below PCS comments on the Draft Exposure Assessment Memorandum. Latrice Babin is the POC for this review.

Have a great weekend.

Bob

From: Babin, Latrice (PCS)
Sent: Wednesday, March 07, 2012 5:13 PM
To: Allen, Bob (PCS)
Subject: Comments on the draft EAM

Hello Bob,

The following are my comments on the *Draft Exposure Assessment Memorandum (EAM)*:

Observation:

The EAM was developed to outline the process that will be utilized in the Baseline Human Health Risk Assessment (BHHRA). It outlined the chemistry data reviewed for evaluating human exposures of persons who work in the area of the site, fishermen (both for subsistence and recreational) as well as those who are trespassers on the site.

❖ Section 3.1—Chemical of Potential Concern

- This section identifies metals and inorganics as potential concern for human health (also Table 1 of this document). However, this list is not completely reflective of the list identified in the Preliminary Site Characterization Report (July 2011 – Table 1-2). The section refers the reader to Table 2 for the additional COPC list, please explain the reason for the two list. This issue presents slight confusion as to which chemicals will actually be included in the evaluation.

❖ Section 3.4.3.1.2 – Post TCRA

- This section provided detail of the limited soil sampling considered “exposure area” once the fencing was in place. Only six samples represent this area thus rendering the sample size too small. We request an expansion of this sampling area to provide a more representative evaluation for the BHHRA.

❖ Section 4.1 – Introduction to Exposure Equations and Parameters

- The explanation of Body Weight as used in Equation 4-4 (Intake via ingestion of Fish and Shellfish) states
“USEPA’s 2011 Exposure Factors Handbook (USEPA 2011b) provides mean values for body weight by age, based on data collected from the 1999-2006, National Health and Nutrition Examination Survey (NHANES). Age – specific mean body weights from this source have been adopted for the

BHHRA. “

- Do the age-specific mean body weights take into account childhood obesity (especially among the lower socioeconomic groups) gender, or ethnicity? Consideration of these things, especially in the Houston / Harris County area should be imputed in the overall parameter based on the available data regarding these issues.
- Exposure Frequency (EF)
 - The section indicates that the “USEPA’s guidance recommendation for exposure frequencies for residential and worker population (350 days/year and 225 to 250 days/year for various types of workers, respectively” , however, there is not a good sense of what the default factor will be. Please clarify and state the chosen value.
- Exposure Duration (ED)
 - The definition of ED was provided, but as in the above parameter, not clear indication of the value was given. Please clarify and state the chosen value.

Thank you for the opportunity to review this document and submit comments on behalf of the citizens of Harris County.

Regards,
Latrice

Latrice Babin, Ph.D.

Environmental Toxins & Special Project Manager
Harris County Pollution Control Services Department
101 S. Richey, Suite H
Pasadena, Texas 77506
(713) 274-6413
(713) 274-6475
email latrice.babin@pcs.hctx.net